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Before the
Federal Communications Commission
Washington, DC 20554

FEB 25 1993

FCC MAIL ROOM

In the Matter of)
)
Replacement of Part 90)
by Part 88 to Revise)
the Private Land Mobile)
Radio Services and Modify)
the Policies Governing them)

PR Docket 92-23

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FEB 26 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To the Commission:

COMMENT OF JAMES D. MORRISSEY, INC.

James D. Morrissey, Inc. submits its comments in opposition to the Commission's Notice of Proposed Rule Making in this proceeding, for the following reasons:

1. As it relates to the channel splitting proposal, the date of 1996 is far too early to allow a reasonable opportunity to amortize proposed equipment and give manufacturers time to develop a full line of proven quality narrowband equipment. It has not been demonstrated that reliable communications are possible in such narrow channels. If such a proposal is to be considered, it should be postponed until the end of the 1990s so that only one equipment change, not two as the FCC now contemplates, would be necessary.

2. As it relates to the power reduction plan, the planned power reduction